

February 23, 2015

Dear DRECP:

California Energy Commission

**DOCKETED**

**09-RENEW EO-1**

TN # 75071

FEB 23 2015

Please include me as a commenter of record on this project.

The massive EIS indicates the USFS is NOT an agency of record in this process. HOWEVER, if you look at the plans on transmission they could impact the forest. This intention is not at all clear. See the Summary, page 14 section 1.2 DRECP Planning Goals. See the bulleted items on that page, under the section "Renewable Energy Goals"

"Build on the Competitive Renewable Energy Zones identified by the Renewable Energy Transmission Initiative"

Which is otherwise known as "RETI".

Would you please tell me how RETI qualifies as a bonified vehicle for making this determination?

How can it pass as legitimate when the RETI group was disbanded in 2010?

How can it pass when much within RETI has changed?

How can it pass when RETI does not follow NEPA required processes, public disclosure, and public opportunity to comment?

How can it pass when RETI crosses laws governing Federal Authority over Federal process over state authority and vice versa? RETI has not been reviewed for Federal disclosure or Federal Authority and assumes state and county authority where it does not have it. RETI makes assumption about the USFS but you have not included the USFS in your MOU for this project nor have they been listed in the EIS. This is discriminating against the Federal Department of Agriculture and claiming authority over a Federal Agency that has not been supplied with equitable opportunity to input.

Somewhere deep in this EIS is a map of the DRECP transmission suggestions with a key for how difficult they believe it will be to get approval. Which in my opinion is a sick perspective on delineating these and hardly a NEPA quality assessment of them. Obviously you could not actually have this information because you have not involved the agency where some of this lays. Therefore would it not be true that you are actually making false statements to the Federal Government about the DRECP project with respect to USFS lands and indicative of considerable conflict of interest? How could you have this information without their input or how could this be true?

The goal of the project is to identify the areas and corridors where the DRECP work will proceed but it does not do this for transmission nearly equitably which I think we can verify is a significant impact and a significant process. It is not connecting this with any current USFS master permit issues either. Given that, the DRECP should not be a nanometer in the Forest

without USFS involvement or disclosure of the NEPA required connected actions, future foreseeable actions, or cumulative impacts of this process. Likewise you cannot add this in 'sometime' later because it is illegal to piecemeal this process into sections to make it look smaller than it is. However with the illusive transmission references, hard as it is to believe, this project is considerably bigger than it is already is being touted.

RETI, in my opinion, could not POSSIBLY be considered a legal process for identifying these. It did not carry out a legal NEPA process and furthermore did not even notify any local county planning groups of its existence here in San Diego. The group, RETI had its last conference coordinated or MC'ed by Carl Zichella, energy policy director to the Sierra Club CEO, Carl Pope in 2010. The group calling themselves a task force to the "RETI" process or often themselves referred to as RETI as well as the initiative they wrote, disbanded soon thereafter; RETI is no longer active but the work was handed over to the BLM and subsequently to the counties to carry out. Carl Zichella and Carl Pope left the Sierra Club and went to work at the NRDC.

Hence on its coattails, the county of San Diego tried to remove all county planning groups, as well as commenced a project called the County Wind Ordinance. They were not successful in removing the county planning groups but they did add restrictions to county planning groups for making comments on Federal projects, thus reducing the time which these groups have to comment before handing them to the counties for approval. This too would seem to be in violation of Federal law not only for not allowing County planning groups the Federally legal criteria for commenting but also for assuming authority over Federal process. This could have the appearance of violating the FTC anti-trust laws as well as potential for SEC violations including conspiracy to commit insider trading and racketeering.

RETI or RETI organization or planning group, also did not bother to tell the new Forest Supervisor at the time of RETI either. In 2010, I called of the major planning groups myself including Boulevard's Donna Tisdale a major researcher and commenter on these projects most especially the Sunrise Powerlink, as well as Ramona, and Julian and not a one had heard of it.

The former state attorney general, Jerry Brown, who now happens to be our governor HAD actually heard of it and made considerable mention in a letter how RETI planned to build wind farms near Warner Springs, Ca, and the Navy training facility, in that letter, to some key interested parties on the Navy seers project in 2009. Interestingly though, instead of emailing the new FS Supervisor it was the only notification of their comments, that was faxed with no critically identifying phone or confirmation of its destination and receipt. -- And naturally the Forest Supervisor did not get the fax. I sat face to face with him in his office and asked and there is no way he knew what it was I was asking about. YOU did not disclose this to our local Forest Service even then. How several years later can you assume that making a decision in the US Forest based upon that process could possibly be legal? I looked up the participants to the RETI process and the only member of the USFS was someone from

OREGON. Since DRECP is a state of California project how can this RETI process possibly ascribe to Federal law?

That did not keep the county from placing potential wind projects in the Forest and publishing them without contacting the Forest Service first on their County Wind Ordinance. When the USFS found out what the County of San Diego was trying to do "under the radar" these projects were removed and blackened from the maps immediately.

Please tell me how it is, than, given its history, that through RETI you have assumed to have some level of authority over our Cleveland National Forest yet they are not even contacted on this DRECP project?

The layers of this process, through RETI, the massive BLM project, and an elusive connection to 'maybe-possibly-sorta-somewhat' a connection to the USFS are unwieldy.

I think you have interwoven and layered this process over so many years so as to hide the illegal connections to dubious data in a dubious process.

When I review the patterns, the intentions, the secretive and slight disclosure that has led to this, the buried connections to involvement of private organizations that acted as though they were speaking as an agency or as though they were expert witness to agencies; but in actuality had not seen these places and had nowhere near the Federal credential for making quality detailed input for pivotal decisions, I have to notice that there is the appearance that this could well be connected to the remnants of ENRON scandal revitalizing the portions of the political machinery that was used in that illegal operative.

What are you doing to assure the integrity of this process?

When county planning groups had more authority at the time of RETI then they now have how do you determine that their input now is equitable as that at the time of RETI when they were not contacted since they were not even told in the first place? They are THE expert testimony but they are not provided that equitable input, indeed it would seem this process has cleverly and slowly sought to marginalize their expert input even specifically with this loan project in mind.

It is an understatement that RETI managed to infiltrate into all levels of Federal, State, and county government and take over authority and processes there. Please provide a thorough accounting of the RETI process and how it has impacted the entire placement and process of the DRECP projects and where it can justify the RETI authority to do so?

To what extent did the National Sierra Club, the Center for Biological Diversity, the Desert Protection Council, and the National Resources Defense Council, EACH have input and to what extent authority into this process?

At the time RETI was making its plan for green energy in southern California including maps with color coded importance on them, the local committees and sub committees of the Sierra Club were allowed to comment on behalf of their jurisdiction within the Sierra Club. On the heels of the 2010 RETI convention the National Sierra Club issued a new directive that these committees were not allowed to input comments to any energy related projects. I had been

asking by that time for three years what on earth was going on as many members with decades of expertise and noted subject matter experts were no longer allowed to attend energy meetings and their input was not given apparent equitable consideration. These energy committees continued to deny that they were discriminating and intercepting and marginalizing in any number of ways the input of the rest of its members.

When this document was released saying we could not input, it validated obviously I had been right all along. Given the energy advisor to the National Sierra Club at the time, Carl Zichella was also a key player in coordinating RETI, his removed web page, formerly looked like a large scale energy marketing piece, and he acted as the "MC" of the two RETI conferences obviously the Sierra Club at that time had key input to this process and was now controlling the input of data experts into this process.

I was very upset by this because the connected Sunrise Powerlink which is also potentially very significant to DRECP was suddenly moved out of the original desert route in a manner that many changes along the way were not allowed full NEPA process and full public required input. The final determinations of non-mitigatable impacts of Sunrise were all very close, in my opinion too close to be ordered in any statically ordered significance with any statistically calculated two-way analysis as variance to make a valid comparison. However that was not all. At the very end of the 10000 page EIS to Sunrise, and only on a map, not the textual discussion, was a reference to potentially adding lines running north. This criteria had already been BUSTED by environmentalists before the CPUC as being hidden within the Sunrise process and not provided full disclosure. SDG&E admitted at that time that it needed to eventually go north but they did not quantify that analysis in the EIS none-mitigatable impacts. The accounting of mitigatable impacts from Sunrise in the South Route used in determining that ROW did NOT include the information on that final map showing a potential for adding a route north even though the documentation included SDG&E saying that for the project to be effective they had to go north.

So with the addition of the added north section the un-mitigatable impacts of Sunrise south route compared to the other options was indeed considerably higher. Indeed SDG&E was telling the truth when they said the south route was not acceptable in the beginning. I would add I do not think any of the routes were acceptable but the south route was a horrible in a world of comparing "horribleness" worse than any. SDG&E favored their own northern route a modification of the original desert route. Am I to now put all of this together and extrapolate that in many ways not only was the USFS left out of critical details of the bigger plans within RETI but in many ways as hard as it may be, given the politics and media surrounding this issue, so was SDG&E; and they were more or less pulled into a transparent massive expansion, after their original proposal?

When the letter came from the National Sierra Club informing key groups that only the National Sierra Club would make energy related decisions "because global warming was so serious that they and they alone could make that decision" the letter was forwarded to me.

I immediately responded that they had been coordinating with our energy committees locally and deceiving and usurping all other expert, especially field level ground input, including mine, all along while in apparent communication with energy companies including SDG&E. I pointed out to do so on a FEDERAL project was a violation of the Federal Procurement Integrity Act and had the appearance of conspiracy to commit insider trading and racketeering at tremendous hardship and expense of its members, many who like myself had been solicited BY the Sierra Club for over a decade prior to work on the establishment of Federally Protected Wilderness protection and in some cases Inventoried Roadless Protection in many of these SAME areas. Essentially what The Sierra Club and apparently its involvement with RETI had done was through requesting Wilderness documentation from long term willing volunteers was to find out who gave a damn about these areas so they knew whose lives to marginalize and who to keep out of this process. And apparently the Sierra Club and other organizations had been infiltrated by energy interests so that they could do this dirty work out of view of the core Federal process that RETI was attempting to describe without a real NEPA or CEQA process.

When my letter went out several key community commenters and consultants wrote in support of my letter including the former Forest Supervisor. Four days later Carl Zichella and Carl Pope announced that they were leaving the Sierra Club and working for the NRDC, or National Resources Defense Council.

So I ask you, Is this a result of my letter calling out their potential for insider trading, etc., or is this just the coincidence of the century?

If you are thinking this commenting is getting deep in the weeds consider that DRECP is also under many layers of bureaucracy and in of itself very complex by your own admission, involving cross coordination of state and federal authority. That alone is cause for concern that crucial scrutiny and review assures that this does not result in fraud. I remain highly concerned that it has. I am going to continue with the details in good faith that you will, as required, take the whole testimony and consider all when it is all supplied, as any court would require.

At that time I had not heard of RETI but soon after the dots that made up this interesting set of circumstances motivated me to look through the internet at the information on Carl Zichella. The Sierra Club had intended to challenge the Sunrise Powerlink. Our regional coordinator who at one time had been the coordinator of our wilderness bill, the California Wild Heritage Act, and then the representative for the Sunrise Powerlink and who had the use offered pro bono services of a Federal Attorney already in play, suddenly all backed off. We were told it was because of the energy position being taken by Carl Zichella disseminated through the National Sierra Club board and to our regional representative. Clearly the local and regional mind set was in a very different path from Carl Zichella already years in play when by the hands of a very few it was called off. The regional coordinator was pulled off of Sunrise, the pro bono attorney's services were cancelled and the regional coordinator was placed in a key position on the "Beyond Coal" and subsequent "Beyond Oil natural gas" projects with the Sierra Club. One of Beyond Coal's self-noted accomplishments is an accumulation of shutting down coal operations and adding industrial scale wind and solar farms. This is a private organization but it, as my internet search bore out, was having an enormous direction upon RETI that you now

claim is the fundamental component to your transmission siting, a Ca. State, and Federal process, on places that are now even recommended wilderness as a result of a court ordered process to determine them involving a number of challenging organizations and the four Southern California US Forests.

I have since uncovered a number of collaborations within this process where underlings were instructed to make room for transmission corridors in the USFS AND without alerting the Forest Supervisor and district rangers, right in apparent tandem to the demise of that Fax mentioned above by the former Ca State Attorney General.

Their input was not based upon field knowledge as I have that knowledge and it was very easy to determining where they did not. I am not so upset with the subordinate individuals at this point, seeing the incredible path that led to pressuring ordinary work-a-day life employees by this hugely overpowering process. There is no way to expect the lay person to have had the level of finesse to recognize and react; though in some cases it might do well to add, a lie is a lie if you know you are making one. However at the threat of losing one's career it seems the weight of this issue lies with the people higher up the food chain who orchestrated this very complicated process and by all appearances racket and extortion upon a number of working class people.

Recall the trilogy, Back to the Future. I submit that like the points of that movie, if we were acting under one set of rules at the beginning any number of authoritative roles such as the National Sierra Club over its members, The County of San Diego over its planning groups, cannot change the rules mid-stream so as to affect the outcome of the future 'downstream'. To accurately accomplish this upon changing the rules the entire process would have to start over, fully "upstream" of the whole process. This is interesting given the tight relationship the Sierra Club had over RETI that is now being referenced as a critical component to a Federal project. Did the National Sierra Club of 2007 thru 2010 become part of the Federal cabinet or Congress? Suffice to say those players may be gone as many have liked to point out when I try to explain this very convoluted process; however their impact and the process they put into motion is apparently far from gone. We have no way of knowing to what degree those players are still involved under the radar.

I have talked to a number of biologists and archeologists and heard the testimony of at least one geologist before the CPUC administrative law judge, none who verified the integrity of this process. A number of biologists and archeologists said they were told not to find anything or they would not have a job. Several also claimed they were picked on and under constant intimidation while working on these projects, so much so, that they ended up leaving anyway. Other biologists were paid much more than customary in an apparent attempt to get them to claim no findings of significant impacts such as to eagles. Hence, I think it is very apparent that people were paid to marginalize and sugar coat findings. How are you preventing extortion and bribery on this project and its future projects?

What are you doing to ensure the oversight, protection, and security of your data experts? Upon uncovering RETI, not finding its discloser in any county planning groups, and seeing its path then transferred to the BLM and then to the counties, but not on the USFS where projects were also happening, and where lands were being designated wilderness recommended, it

becomes obvious that RETI is the illegal process that has led to DRECP. Please provide full disclosure as to how RETI and other collaborations have been put together for this process, more than a slight reference to "scientists".

While the Boulevard Planning group may not have been provided disclosure by RETI the Boulevard Planning group was carefully documenting its own process. Their meetings contain in plain view a tape recorder.

IN January of 2011 I was subpoenaed by the Protect our Communities Foundation to which I had subscribed and donated money, into a four hour deposition by SDG&E on the lands under the South Route. This was in preparation to challenges by the POC on Sunrise Powerlink. Two weeks later the Boulevard Planning group with some overlap to the POC received threats by a woman representing a solar company wanting to do a large Solar Project in the area. This woman went to a number of government groups such as the San Diego County Council and City council and others claiming that SHE has been threatened by members at the Boulevard Planning Group. Fortunately the tape recorder had been going the whole time and her claims were conclusively disproven.

During the very same time I was awakened one morning by two Forest Service Law enforcement agents. Given the Sunrise history I still considered the local Forest Service very good professional friends and welcomed the two agents into my home. They asked if I could help them because the US Forest Supervisor had been receiving death threats on any approval of the Sunrise Powerlink. Of course I said yes. They placed before me one of the threatening letters and immediately before even reading the letter I noticed that there was something wrong with the font. It was something I had not seen but I could not tell why it was odd at first. They asked if I knew something about printers and I said yes, I work for HP. They asked what I did and I said I test solutions for the US Navy Marine Corp, NMCI. They asked so do you have secret clearance, and I said yes. They responded, "ohhhh".

I had just been on a project where I had to research the Navy font on some screens that was being changed from EDS to HP. So some of these fonts were actually rather fresh in my mind at the time.

I was to find out subsequently they interviewed all of my neighbors, then went to my ex-husband interviewed him and then all of his neighbors and then interviewed some of my neighbors some more.

Seriously Is there any doubt why I fear the scruples behind the players of these projects?????

They had left me with their card and said to call if I had information for them. I called three times. They never answered and they never returned a call. Months later I was sitting in the Office of Will Metz the Forest Supervisor and I told him, "they wanted my help but they never returned a call. **Please consider that your safety is NOT the reason they were there.** "

I think the reason they were there was to drive a wedge between me and the Forest Supervisor when they had just seen how good and thorough my knowledge of the Forest is from the deposition only weeks before. The entire Sunrise acceptance was over we should have been

done with thinking about it. It made no other sense that they would have waited months to do this.

I researched the font and apparently always and forever the default Microsoft font for printing had been New Times Roman. Everyone probably knows this. When Microsoft developed a new font for flat screen monitors, they came up with Calibri. IN early 2011 we saw this on screen but not in print. This was because they had not licensed the default use of it until later versions of Windows Vista and more fully in Windows 7 or additionally in the new Microsoft Office 10. Both came out late in 2010. Then in the early spring of 2011 I went to the USFS office and noticed that the receptionist was running office 10. I had never seen it before because there is usually a good lag before governments install new versions of software where I worked.

Apparently the USFS was one of the first to get it installed. I wrote the district ranger and asked her to notify the Forest Supervisor, on top of the close connection to the Boulevard Planning groups busting of a solar company for attempting to do the very same thing at the very same time, it would appear that you should consider that these threats are an inside job". When I went to see Will in his office months later and told him again myself he said, "the issue has since been resolved". When they told me the FS Supervisor was threatened I was in tears. Resolved? IN my experience threatening a federal officer results in "apprehension" and "prosecution". That was some "resolution". --He the consummate professional maintains the company poise...

Additionally I discovered a multitude of incongruences which resulted in several, **many** additional field trips to photograph and validate that the input by some on the Forest Plan, or LMP was bogus claiming ground checking that had not occurred. Such later admitted that they had been told to find a corridor for a future power line indicating not by the District Ranger or the Forest Supervisor, though I do not know by whom; hence, the series of mistruths and map manipulations between the LMP and the subsequent Forest transmission Master Permit, the reason for a number of, as they explained it, "weird behaviors" they said at the first "scoping" open house on the Supplemental LMP. Neither the Forest Supervisor nor the district ranger had been told. I think the source of this pressure needs to be challenged. I can forgive the underlings but not the pressures from apparently way up the food chain. We can therefore tie the dots that all feed into the unbelievable manipulation of federal processes all the way to this DRECP, and upon unwitting citizens who just love to walk in the woods enough to comment on these projects.

Therefore I conclude that with your declaration sited above of using RETI in this process connects these dots, and this process has roots that to my sense of appearance are all coming together with the DRECP and have a long long history of corruption and VERY illegal behavior. Indeed these have the appearance when all put together of severely conspiring to commit insider trading, Racketeering, violations of antitrust laws as clearly democratic based free enterprise was being circumvented the very definition of a trust that walls off free enterprise, violations of the Federal Procurement Integrity Act, and every state and federal environmental law in the book. Additionally, indeed, this is also as a collection, when all tied together, has all the appearances of threats to National Security and should be taken and investigated with that level of seriousness because they sought and carefully orchestrated a process to circumvent

fundamental democratic processes of this Nation to accomplish their own agenda for their own profits at the expense of our Nation's resources and people. Indeed this is serious.

Four people whose collective leadership was formidable died, DIED!!!, oddly, and suddenly, with a focus right under that potential ROW leading north, and since two more similarly interested and significant parties died, and several others had close calls.

Is this a coincidence? If there is a 99% chance that it is, is that enough?

These were some but not all of the circumstances that have brought me to this concern. Ordinary people such as myself have had to work doubly hard to achieve the goals to which we were recruited as volunteers because someone up the food chain infiltrated the people and organizations that recruited us and changed the rules. All of that to influence indirectly and out of site of the Federal Laws and criteria within that guarantee our rights to participate.

Our efforts and relationship to the USFS have prevailed and we are grateful to them for their courage thus far to do the right thing even in the confusion and controversy. It seems too ironically odd that they have been omitted from this project unless indeed you have NO INTENTION WHATSOEVER of coming near the US Forest with these projects.

This project has skirted authority over the areas where they want to put their projects. This violates the NEPA "providing enough information to make an informed decision" rules. YOU have not honored the USFS standards of public involvement on USFS lands by many times over. IN the Sunrise Powerlink days the BLM would not accept objections unless they were coming from apparently attorney level input; or they were written off as "un-substantive", arbitrarily and capriciously, totally contrary to the criteria of NEPA and Federal Lands Management Policy.

Thank you for this opportunity to participate in the democratic process of this land.

Sincerely,

Cindy Buxton

**On behalf of myself.**

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